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26 UNITED STATES DISTRICT COURT

27 EASTERN DISTRICT OF CALIFORNIA

28 G. I. S. E. by and through his guardian ) Case No.: 2:22-cv-01654-JDP  
19 ad litem, EDDIE SANCHEZ, )  
20 Plaintiff, )  
21 vs. )  
22 CITY OF CHICO, CHICO POLICE )  
23 DEPARTMENT, MARK BASS, )  
24 DAVID BAILEY, and DOES 1-50, )  
25 Defendants. )  
26  
27  
28

1 Plaintiff G.I.S.E., by and through his guardian ad litem, EDDIE SANCHEZ,  
2 and Defendants CITY OF CHICO, CHICO POLICE DEPARTMENT, MARK  
3 BASS, and DAVID BAILEY (the “Chico Defendants”), by and through their  
4 respective counsel of record in the above-captioned litigation, hereby present this  
5 Stipulation to Modify the Scheduling Order only with regard the to the Discovery  
6 Cut-off deadline based upon the following good cause:

7 **TO THE HONORABLE COURT AND TO ALL PARTIES AND  
8 COUNSEL:**

9 The parties have worked diligently to schedule depositions and conduct  
10 discovery. The parties have several depositions scheduled to take place before the  
11 end of October 2025. Discovery cut-off is currently scheduled for October 31, 2025.

12 There are still numerous party, and non-party and expert witnesses who will  
13 need to have their depositions taken in this action. The current deadline of October  
14 31, 2025, for discovery will not afford enough time for the parties to complete this  
15 phase of discovery.

16 The parties are not requesting the Court to modify the operative dates and  
17 deadlines for the Final pretrial conference and Jury Trial. This stipulation is the  
18 parties third request for any continuance in this action.

19 **STIPULATION TO MODIFY THE SCHEDULING ORDER**

20 Accordingly, in light of the foregoing Good Cause, the parties hereby  
21 stipulate to and jointly request that the Court enter an order to modify the  
22 scheduling order, as follows:

23 1. The parties respectfully request an order continuing the expert and  
24 non-expert Discovery cut-off date from October 31, 2025, to November 28, 2025.

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2. Except as specified herein above, all other operative dates and deadlines within the Court's Scheduling Orders would remain unchanged and unaffected by the parties' Stipulation or any associated Order made pursuant thereto.

## **IT IS SO STIPULATED.**

Dated: October 14, 2025

Respectfully submitted,

ALVAREZ-GLASMAN & COLVIN  
JOHN W. LAM  
CITY ATTORNEY

Dated: October 14, 2025

## LAW OFFICE OF FULVIO F. CAJINA

Dated: October 14, 2025

## LAW OFFICE OF STANLEY GOFF

/S/ Stanley Goff

Stanley Goff

Attorney for Plaintiff, G.I.S.E.



1                   **[PROPOSED] ORDER**

2                   Pursuant to the Joint Stipulation of the parties and Good Cause appearing  
3 therefor, IT IS HEREBY ORDERED: The operative case management  
4 scheduling order is hereby modified, as follows:

5                   1.       The expert and non-expert Discovery Cut-off is continued from October  
6 31, 2025, to November 28, 2025.

7                   2.       All other operative dates and deadlines remain unchanged.

8                   IT IS SO ORDERED.

9  
10                  Dated: October 16, 2025

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12                  \_\_\_\_\_  
13                  JEREMY D. PETERSON  
14                  UNITED STATES MAGISTRATE JUDGE